

REMARKS

At the outset, the Examiner is thanked for the thorough review and consideration of the pending application. The Office Action dated March 21, 2006, has been received and its contents carefully reviewed.

Claims 1-2 and 5-11 are rejected by the Examiner. Claims 1-5 and 10-13 have been amended. Claim 22 is newly added. Claims 14-21 are withdrawn. Claims 1-22 remain pending in this application. Claims 3, 4, 12 and 13 are objected to by the Examiner.

In the Office Action, claims 1, 6-9 and 11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,407,784 to Kanou et al. (hereinafter "Kanou '784") in view of U.S. Patent No. 6,784,957 to Kanou et al. (hereinafter "Kanou '957"). Claims 2, 5 and 10 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kanou '784 in view of Kanou '957, and further in view of Applicant admitted prior art (hereinafter "AAPA") Applicants wish to thank the Examiner for the indication that claims 3, 4, 12, and 13 contain patentable subject matter.

Claim 5 has been amended to address the objection of the Examiner.

The rejection of claims 1, 6-9, and 11 is respectfully traversed and reconsideration is requested. Claims 1, 6-9, and 11 are allowable over the cited references in that each of these claims recites a combination of elements including, for example, "forming a plurality of second peak patterns between the first peak patterns from the second organic insulating layer by using a second mask." None of the cited references including Kanou '784 or Kanou '957, singly or in combination, teaches or suggests at least this feature of the claimed invention. In both Kanou '784 and Kanou '957 the second peak patterns are not between the first peak patterns as claimed. Rather, the peaks of the different layers are coincident with one another. Accordingly, Applicant respectfully submits that claims 1, 6-9, and 11 are allowable over the cited references.

Claims 2, 5, and 10 depend from allowable claim 1 because the additionally cited ARA does not cure the deficiencies of Kanou '784 and Kanou '957 identified above.

Newly added claim 22 depends from claim 1, so is allowable for the same reasons as claim 1 above.


Applicants believe the foregoing amendments place the application in condition for allowance and early, favorable action is respectfully solicited.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at (202) 496-7500 to discuss the steps necessary for placing the application in condition for allowance. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. § 1.136, and any additional fees required under 37 C.F.R. § 1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. *A duplicate copy of this sheet is enclosed.*

Respectfully submitted,

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